03.01 - 10/14/1997-02558

UNITED STATES MARINE CORPS
MARINE CORPS BASE
PSC BOX 20004
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:
6287
BEMD
14 OCT 1997

From: Commanding General, Marine Corps Base, Camp Lejeune.
To: Commander, Atlantic Division, Naval Facilities Engineering Command, Attn: Ms. Katherine Landman (Code 1823), 1510 Gilbert Street, Norfolk, Virginia 23511-2699

Subj: REMEDIAL INVESTIGATION OPERABLE UNIT NO. 17 (SITES 90, 91, AND 92)

Encl: (1) Comments on the Remedial Investigation Operable Unit No. 17 (Sites 90, 91, and 92) Marine Corps Base, Camp Lejeune

1. The subject document has been reviewed by the Installation Restoration Division, Environmental Management Department, Marine Corps Base, Camp Lejeune. Our comments are contained in the enclosure.

2. It is requested that the Installation Restoration Division be notified of the actions taken to accommodate the comments.

3. If you have any questions or comments, please contact Mr. Brian Marshburn, Installation Restoration Division, Environmental Management Department, at DSN 484-5068, or commercial (910) 451-5068.

SCOTT A. BREWER, PE
By direction

RI Report

OPTIONAL FORM 99 (7-90) 10-17-97
FAX TRANSMITTAL # of pages ▸ 4

To MATT BARTMAN	From KATE LANDMAN
Dept./Agency	Phone #
Fax # 412 269 2002	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Comments on the Remedial Investigation
Operable Unit No. 17 (Sites 90, 91, and 92)
Marine Corps Base, Camp Lejeune

General Comments:

1. This Operable Unit is in a region of possible near-term growth aboard Marine Corps Base (MCB), Camp Lejeune. The Record of Decision (if a Proposed Remedial Action Plan and Feasibility Study are going to be bypassed) should address possible facility construction or remodeling and/or developmental limitations based on existing conditions.

2. Please give a more detailed explanation in the document's "Preface" or in the "Background" Section for each site as to why a Focused Remedial Investigation (RI) was performed as opposed to a typical Remedial Investigation; mention the concurrence of the regulators with this approach.

3. For each site, subsurface soil samples submitted to the fixed-base laboratory had positive detection's for inorganics (namely calcium) that exceeded twice the inorganic's average base specific background concentrations. Some of these particular inorganics had no residential background criteria (RBCs) with which to compare to the high detection's. Therefore, should we automatically eliminate calcium from selection as a contaminant of potential concern?

Specific Comments: **Site 90**

1. § 2.7 Identification of Water Supply Wells, page 2-6, paragraph 1. The last sentence in the paragraph states that groundwater is treated at five plants with a total capacity of 15.8 gpd. Please correct either the number or units to reflect proper treatment capacity.

2. § 2.7 Identification of Water Supply Wells, page 2-6, paragraph 3. It is mentioned in this paragraph that contamination was found in supply well BB-44 by Geophex in 1990. For note, recent groundwater samples collected from this supply well (January, 1997 and June, 1997) indicate that all volatile contaminants tested for by EPA test method 524.2 were below the analytical laboratory's minimum detection limit of 0.5 ppb. Please make mention of this.

3. Table 2-3. Based on the depth to groundwater measurements obtained on 26 April 1997 from monitoring well IR90-TW05, the groundwater elevation at this well should be 3.19 feet, msl rather than the reported 3.17 feet, msl.

4. § 3.2.1 Temporary Well Installation, page 3-3, paragraph 1. Sentence five (5) should have the unit "inch" between "3 1/4-" and "diameter".

5. § 3.2.2 Well Development, page 3-3, paragraph 1. Sentence five (5) is incomplete ("...decontaminated __?__ damp paper towel...").

Enclosure (1)

6. § 3.5 IDW Management, page 3-5, paragraph 1. The first sentence should read "Soil and groundwater sampling activities associated with this investigation resulted in the generation of IDW".

7. § 4.4 Analytical Results, page 4-4, paragraph 1. Opening sentence mentions analytical results from Site 91; should be Site 90.

8. §4.4.1 Soil Investigation, page 4-6, paragraph 6. Please indicate that the fact that levels of inorganics in the soil samples collected were lower than base background concentrations indicates that inorganics found in the samples are likely the result background conditions and not site related.

9. § 4.4.2 Groundwater Investigation, page 4-7, paragraph 3. Please change the designation of monitoring well IR90-MW08 from "temporary" to "existing". Also, it is stated that PCE contamination detected in monitoring well IR90-MW04 is possibly due to a result of an isolated spill from the filling process of ASTs near building BB-16; what would be a possible reason for the detection of PCE at monitoring well IR90-MW08 since this well is not downgradient (regarding groundwater flow) of building BB-16..

10. § 4.6 Quality Assurance/Quality Control, page 4-8, paragraph 4. Is it natural that this number of inorganics (11) would be present in an equipment rinsate blank?

11. § 5.2.1 Identification of Data Suitable for Use in a Qualitative Risk Assessment, page 5-2, paragraph 3. In third sentence, change phrase "upon closure of this facility" to read "in the event of closure of this facility".

12. § 5.2.3.2 Groundwater, Fixed Base Laboratory, page 5-6, paragraph 2. Eliminate the last sentence.

Specific Comments: **Site 91**

1. § 1.3.1 Three Well Site Check, page 1-2, paragraph 2, bullet 1. Delete the second mentioning of "TPH-total oil and grease.

2. See Site 90, Comment 1.

3. See Site 90, Comment 2.

4. § 3.6 Variations from the Project Plans, page 3-6, paragraph 1, bullet 1. Remove word "provide" from third sentence.

5. See Site 90, Comment 10.

6. Se Site 90, Comment 11.

Specific Comments: **Site 92**

1. See Site 90, Comment 1.

2. See Site 90, Comment 2.

3. § 3.2.4 Groundwater Sample Analysis, page 3-4, paragraph 1. Please explain why only one (1) confirmatory sample was submitted to the fixed-base laboratory.

4. § Table 4-3. This table is the same as Table 4-2. Please correct.

5. See Site 90, Comment 10.

6. Se Site 90, Comment 11.